plan was defeated when the United States Senate refused to confirm the nominations. A few months before the inauguration of the Philippine Commonwealth, President Roosevelt, coincidently with the approval of the Philippine Constitution, named Hon. Claro M. Recto, the President of the Convention which had drafted the Constitution, a member of the Court, thus giving the Filipinos a majority.

The policy has also been to have a Filipino Chief Justice, and the four jurists who have filled the position have been Filipinos. Cayetano S. Arellano, Victorino Mapa, Manuel Araullo, and Ramon Avancefia proved themselves to be exceptionally well qualified for the position and commanded the, respect of their colleagues and the confidence of the public.

The Supreme Court has in turn been the subject of unstinted praise and unjust criticism. Judge Charles B. Elliott, once a member of the Court, has written that the "Court has always enjoyed the deserved confidence and respect of the country."[5] A similar finding was made by the Wood-Forbes Mission. Secretary of War George H. Dern in his address on the inauguration of the Commonwealth of the Philippines paid tribute to the Supreme Court by characterizing it "as an everlasting credit to both the American and Filipino peoples." On the other side of the shield appear the vicious attacks of Representative Tomas Alonso. With a personal spite to vent, he gained momentary notoriety by airing his grievances before the House of Representatives. But the blackest mark on the record of the Supreme Court was made

when out of the 1926 bar examinations appeared a scandal which involved confidential employees of the Court and three private secretaries of the Justices.

The Constitution of the Philippines continues the Supreme Court with a few changes. Under the Philippine Common-wealth, the Court will be known as the Supreme Court or the

[6] **Charles B. Elliott, *The Philippines to the End of the Commission Gov-ernment* (1917), p. loa.**